

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE:  
NELSON VARGAS CORDERO  
MARY J. RODRIGUEZ QUIÑONES

Debtors

IN RE:  
NELSON VARGAS CORDERO  
MARY J. RODRIGUEZ QUIÑONES

Plaintiffs

vs.

COOPERATIVA DE AHORRO Y CREDITO  
NUESTRA SEÑORA DE LA CANDELARIA; X,  
Y, and/or Z INSURANCE CO.; JOHN DOE AND  
JANE ROE

Defendants

JOSE CARRION MORALES  
CHAPTER 13 TRUSTEE/PARTY IN INTEREST  
CASE 11-02484-BKT

Case No. 98-10612 (ESL)

CHAPTER 13

Adv. No. 11-00151- ESL

VIOLATION OF DISCHARGE  
INJUNCTIVE RELIEF / CONTEMPT  
/ DAMAGES

OPPOSITION TO PLAINTIFFS' MOTION INFORMING  
DEFENDANT'S DEFAULT AND CONTEMPT OF COURT  
AND REQUEST OF BRIED EXTENSION OF TIME

TO HONORABLE COURT:

Come now, Cooperativa de Ahorro y Crédito La Candelaria (hereinafter Candel Coop),  
that respectfully states, prays, and requests as follows:

In the case at bar the Court granted Defendant's Motion for Reconsideration (Docket 38).

By granting the motion the Court granted the 30 days requested by the Defendant to answer

Plaintiff's Motion for Summary Judgment. As a result of the fact that the Defendant missed the deadline to answer the Motion, the Plaintiffs filed a Motion requesting from the Court to find the Defendant in Default. For the reasons set forth herein we request from the Court to deny Plaintiffs' Motion.

The undersigned intended to file the Opposition to the Motion for Summary Judgment during the week of May 28, 2012. To finish it we needed to interview one employee of Candel Coop and the attorney who handled the Superior Court case in Vega Baja but could not coordinate the meetings during that week due to health reasons. As set forth in the medical certification attached, since that week the undersigned has been suffering a severe upper tract respiratory infection. In fact we are not completely recovered from it. Nonetheless we expect to conduct the interviews this week and request from the Court to grant us until June 20, 2012 to submit the Opposition. As far as attorney Cynthia Navarro is concerned, she has not been available to assist us in that matter because her time has also been limited due to the attention she has had to provide to her mother, due to the surgery she was subject to as explained in the Motion for Reconsideration set forth herein (Docket 38).

WHEREFORE, it is respectfully requested from the Court to deny Plaintiffs' motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11<sup>th</sup> day of June, 2012.

I hereby certify that on this same date a true and exact copy of this motion was sent to Edwin Matos Maldonado and Felix Zeno Gloró through the Electronic Case Management System just as to: Nancy Pujals, Esq.- nancy.pujals@usdoj.gov; Monsita Lecaroz, Esq. - monsita.lecaroz@usdoj.gov.

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